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10 Attorneys for WAYMO LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 CASE NO. 3:17-cv-00939-WHA

15 Plaintiff,

16 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC.'S AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL PRODUCTION
OF DOCUMENTS**

17 vs.

18 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

19 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
 7 Ottomotto LLC’ Administrative Motion to File Under Seal Exhibits to Their Motion to Compel
 8 Production of Documents (the “Administrative Motion”). The Administrative Motion seeks an order
 9 sealing highlighted portions of the Letter Brief to Compel Production of Documents (“Uber’s
 10 Motion”) and of the Pritt Declaration ISO Letter Brief to Compel Production of Documents (“Pritt
 11 Declaration”), as well as the entirety of Exhibits 3-6 to the Pritt Declaration.

12 3. The green highlighted portions of Uber’s Motion, of the Pritt Declaration, and of
 13 Exhibits 3-5, and the portions of Exhibit 6 marked in red boxes contain or refer to confidential
 14 business information, which Waymo seeks to seal.

15 4. Uber’s Motion and the Pritt Declaration (green highlighted portions), Exhibits 3-5
 16 (green highlighted portions in versions filed herewith), and Exhibit 6 (portions marked in red boxes in
 17 version filed herewith) contain, reference, and/or describe Waymo’s highly confidential and sensitive
 18 business information, including information related to confidential compensation information for
 19 Waymo employees and confidential details regarding Waymo’s bonus program. Uber’s Motion and
 20 the Pritt Declaration (green highlighted portions) additionally contain, reference, and/or describe
 21 confidential details regarding the results of Waymo’s efforts in searching for documents in this
 22 litigation. I understand that this confidential business information is maintained by Waymo as secret.
 23 The public disclosure of this information would give Waymo’s competitors access to sensitive
 24 information that could be used to Waymo’s disadvantage. If such information were made public, I
 25 understand that Waymo’s competitive standing would be significantly harmed.

26 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Motion, the
 27 Pritt Declaration, and Exhibits 3-6 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on August 7, 2017.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

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12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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